



MARINERS
LEARNING SYSTEM™

Mariners Learning System™
C/O Robert L. Figular – President
3490 US Route One, Bldg #19
Princeton, NJ 08540
(609) 987-0555



In response to public notice dated February 1, 2013 (WT Docket No. 98-228)

Mariners Learning System™ is formally requesting to be considered for the Commercial Operator License Examination (COLE) manager certification.

Description of Mariners Learning System™ and Qualifications

Mariners Learning System™ has gone through the painstaking vetting process and has received course approvals from the United States Coast Guard, National Maritime Center, Department of the Military, Veteran Affairs and Homeland Security.

We are a Coast Guard approved school that has been providing Captain's License training in a classroom since 2002 and online format since 2007. In that time we have trained nearly 40,000 students. Since our online courses were approved we have trained more than 25,000 students and have students around the world taking our courses. Our students enjoy a 98% success rate when taking their final proctored exam with us. However, the more telling number which we are most proud of is our national test average which is 94%. By using a building block approach to the educational process we enjoy success which is unmatched in our industry.

Three years ago we gained the approval of the Veterans Administration which now allows military members both present and past to use their VA benefits to pay for this training. We currently have military members as far away as Afghanistan working out of tents taking our courses when they are not performing their duties. We would be looking to add the MROP license to our current list of VA approved courses.

We have proven ourselves to be not only leaders in the Maritime Educational field but also as innovators offering our courses all over the world. You can gain a wealth of knowledge by going directly to our website at www.MarinersLearningSystem.com or by doing a Google search on Mariners Learning System where you will find 30+ pages of information about who we work with and what others are saying about our products and services.

How will Mariners Learning System™ prevent any conflicts of interest?

FCC courses fit into the Mariners Learning System™ teaching curriculum very well and will cause no conflict with our current course approvals. Our proctors are mostly Licensed Captains and professional educators who have been reviewed by and received approval from the Coast Guard to proctor our examinations. They are paid a flat fee and have no vested interest in the outcome of an examination.

Proposed Fee Structure

The module examination price will be \$50.00 per module with a minimum of \$75.00 being charged for a single module.

An online course will also be offered for student interested in receiving their MROP. A base fee of \$125.0 will be charged, this cost will include online access to the classroom, workbook, and examination fee

Experience and ability to administer qualification examinations by means of computer and written examinations

Mariners Learning System™ is very experienced in offering both classroom and online examinations. Since 2002 we have trained more than 40,000 students. As part of our coast Guard approval we are audited up to three times a year. The Coast Guard has never found any discrepancies with our recordkeeping our testing policies or procedures.

Area in which Mariners Learning System™ is willing to administer examinations

We currently have established Coast Guard approved testing centers and proctors set up in 36 different states with multiple testing locations in each state. You can view a map of the current locations and dates we are testing on by going to the following web page:

<http://www.marinerslearningsystem.com/pages.php?pageid=6>

Frequency of examinations that applicant can begin administering examinations

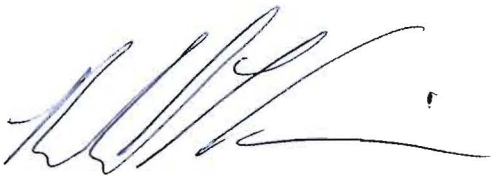
Mariners Learning System™ offers testing on weekly, monthly or quarterly basis dependent on the geographical needs and demands of a particular location we currently run 400+ test dates per year and this number is steadily increasing as demand dictates.

Length of time before an applicant can begin administering examinations

Mariners Learning System™ is prepared to immediately begin offering examinations as a COLE manager. We would simply roll them into our current testing schedule while looking for additional testing locations and opportunities. We will also be working with Military bases and commands to offer this opportunity to existing military members and veterans.

Thanks in advance for your time and consideration.

Respectfully,

A handwritten signature in blue ink, appearing to read 'R. Figular', with a stylized flourish at the end.

Captain Robert L. Figular
President, Mariners Learning System
Phone: (609) 987-0555